

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADVANCED LITHIUM
ELECTROCHEMISTRY (CAYMAN) Co.
Ltd., and ADVANCED LITHIUM
ELECTROCHEMISTRY CO., LTD.,

*Declaratory Judgment
Plaintiffs,*

v.

HYDRO-QUEBEC; CENTRE NATIONAL
DE LA RECHERCHE SCIENTIFIQUE;
UNIVERSITE DE MONTREAL; and
LiFePO₄+C LICENSING AG,

*Declaratory Judgment
Defendants.*

Case No. 1:24-cv-01421-RDA-WBP

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO₄+C Licensing AG, by their undersigned counsel, files this Unopposed Motion to Extension of Time for Defendants to answer or otherwise respond to Plaintiffs' Complaint. In support thereof, Defendants state as follows:

1. Plaintiffs filed their Complaint on August 14, 2024, and provided a Waiver of Service of Summons to each of the Defendants listing August 20, 2024 as the date the request was sent outside the United States. Under Fed. R. Civ. P. 4(d)(3), Defendants' deadline to answer or otherwise respond to the Complaint is November 18, 2024.

2. Defendants hereby request a short extension of time to respond to the Complaint, up to and including December 18, 2024.

3. Counsel for Plaintiffs has indicated that Plaintiffs consent to this extension.

4. The requested extension will not delay proceedings, and no party will be prejudiced by the requested relief sought.

5. Pursuant to Local Civil Rule 7(F)(2)(b), no separate brief in support of this motion is required.

6. Pursuant to Local Civil Rule 7(E), a hearing on this motion is waived by the parties.

WHEREFORE, Defendants respectfully request that this Court enter an Order extending the time for Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO₄+C Licensing AG, to file an answer or otherwise respond to the Complaint on or before December 18, 2024. A proposed order is attached for the Court's convenience.

Dated: November 18, 2024

/s/ April E. Weisbruch
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Attorneys for Defendants

CERTIFICATE OF CONFERENCE

On November 16, 2024, counsel for Defendants met and conferred by email with counsel for Plaintiffs. Plaintiffs stated that they would not oppose this motion.

/s/ April E. Weisbruch
April E. Weisbruch

CERTIFICATE OF SERVICE

I hereby certify that on this day, November 18, 2024, I served the foregoing document via the Court's CM/ECF system to all attorneys of record in this action.

/s/ April E. Weisbruch
April E. Weisbruch